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Refer To File #: 502797-0001

February 26, 2018

Hon. Joseph C. Spero
Chief Magistrate Judge
United States District Court, Northern District
of California
San Francisco Courthouse, Courtroom G -
15th Floor
450 Golden Gate Avenue
San Francisco, CA 94102

Re: *Naiman, et al. v. Total Merchant Services, Inc., et al.*
USDC NDCA Case No. 17-cv-03806-CW (JCS) (the "Action")

Dear Honorable Chief Magistrate Judge Spero:


Pursuant to the scheduling notes on your court calendar, we are writing to inform you that certain of the attorneys for Defendant Total Merchant Services, Inc. ("Defendant") intend to appear at the hearing on Plaintiffs' continued Motion to Compel Discovery Responses from Quality Merchant Services and Michael Alimento (the "Motion") currently set for March 2, 2018, at 9:30 a.m. Specifically, the following two attorneys are setting up a court call and will appear by telephone:

BETH-ANN E. KRIMSKY (admitted pro hac vice)
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LAWREN A. ZANN (admitted pro hac vice)
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As they reside in Florida and with no other hearing in this geographic area for which they are required to appear, Ms. Krinsky and Mr. Zann would face undue hardship, both in terms of time and costs, if they were required to travel from Fort Lauderdale, Florida, to attend the hearing on the Motion.

Respectfully,



James H. Vorhis
for Nossaman LLP

JHV:al